

EXHIBIT 1



McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, VA 23219-3916
Phone: 804.775.1000
Fax: 804.775.1061
www.mcguirewoods.com

Lucy Jewett Wheatley
Direct: 804.775.4320
lwheatley@mcguirewoods.com

July 9, 2025

VIA EMAIL

Mr. Ryan Pamplin
BlendJet Inc.
5159 Commercial Circle
Suite B
Concord, CA 94520
Ryan@blendjet.com

**RE: Documents Produced by BlendJet in *Blendtec Inc. v. BlendJet Inc.*,
2:21-cv-00668 (D. Utah)**

Dear Mr. Pamplin:

As you know, McGuireWoods represents MavorCo Holdings, LLC, MavorCo IP, LLC, and MavorCo Operations, LLC (collectively, “MavorCo”) with respect to the trademark infringement lawsuit filed by Blendtec Inc. (“Blendtec”) in the District of Utah on February 11, 2025, against MavorCo and BlendJet Inc. (“BlendJet”).

Recently, pursuant to a court order, Blendtec produced discovery exchanged by Blendtec and Blendjet in the prior litigation between Blendtec and BlendJet in the District of Utah (the “2021 Action”). That discovery from the 2021 Action was provided on a thumb drive by Blendtec’s counsel to a McGuireWoods office on June 18, 2025. Due to the volume, McGuireWoods was not able to get the documents loaded onto a review platform and made accessible until early this week. You may have seen that, in connection with Blendtec’s pending Motion for a Preliminary Injunction, on June 23, 2025, Blendtec filed a supplemental brief incorporating some of these recently produced documents.

We have now reviewed the documents attached to Blendtec’s supplemental brief and located them in the production. Based on this review, it appears to us that a number of the documents filed by Blendtec contain information that may be protected by the attorney-client privilege, common interest privilege, and/or the work product doctrine.

As noted above, MavorCo had not seen these documents or been aware of them prior to Blendtec’s recent filing. Given that these documents appear to contain material that is privileged and protected, and therefore may have been inadvertently disclosed, we are reaching out to raise this issue to BlendJet pursuant to our ethical duty set out by Rule 4.4 of the Utah Code of

Ryan Pamplin

July 9, 2025

Page 2

Professional Conduct. *See* Utah Rules of Professional Conduct, Rule 4.4(b) (“A lawyer who receives a document or electronically stored information relating to the representation of the lawyer’s client and knows or reasonably should know that the document or electronically stored information was inadvertently sent shall promptly notify the sender.”). *See also* DUCivR 83-1.1(d)(1) & DUCivR83-1.2(a)(1) (requiring attorneys practicing in this Court to comply with the Utah Rules of Professional Conduct).

I am attaching the noted exhibits here for your convenience. In the event that BlendJet asserts privilege over these documents or otherwise claws these back, please let MavorCo know so that we can take the appropriate measures with respect to the copies of these documents that are currently in our possession.

Sincerely,

s/ Lucy Jewett Wheatley

CC: All counsel of record, *Blendtec v. BlendJet*, No. 2:25-cv-00096-RJS-DBP (D. Utah)

Attachments: Exhibit 4 to Blendtec’s Supplemental Brief
Exhibit 55 to Blendtec’s Supplemental Brief
Exhibit 56 to Blendtec’s Supplemental Brief
Exhibit 57 to Blendtec’s Supplemental Brief
Exhibit 58 to Blendtec’s Supplemental Brief
Exhibit 60 to Blendtec’s Supplemental Brief
Exhibit 61 to Blendtec’s Supplemental Brief
Exhibit 62 to Blendtec’s Supplemental Brief
Exhibit 64 to Blendtec’s Supplemental Brief
Exhibit 70 to Blendtec’s Supplemental Brief
Exhibit 71 to Blendtec’s Supplemental Brief
Exhibit 81 to Blendtec’s Supplemental Brief